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**August 11, 2023**

**Via ECF**

Hon. Jennifer Willis, USMJ  
United States District Court, SDNY  
40 Foley Square  
New York, NY 10007

**Re: Williams v. Keyless LLC et al**  
**Case No. 22-CV-04440 (JLR)(JW)**  
**Motion for Extension of Time**

Dear Magistrate-Judge Willis:

My firm represents plaintiff in the above-referenced action, and I respectfully write on behalf of the parties to request a 45-day extension of the August 15, 2023, fact discovery deadline to September 29, 2023. This request is being made because additional time is needed to engage in further settlement discussion, which recently resumed and to complete discovery is the case is not settled. If the case is settled, we will promptly notify the Court. One prior request for an extension of this deadline was made and granted.

We thank the Court in advance for its time and consideration.

Respectfully submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiff*

**cc: Defense Counsel via ECF**